

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ROBERT J. LAMBERT, et al.,

Plaintiff(s),

v.

Case No. 1:05-CV-596

ROBERT STOKES, et al.,

HON. GORDON J. QUIST
United States District Judge

Defendant(s).

**UNITED STATES MOTION
FOR PARTIAL SUMMARY JUDGMENT**

The United States of America, by its attorneys, Donald A. Davis, United States Attorney for the Western District of Michigan, and J. Joseph Rossi, Assistant United States Attorney, respectfully move this court pursuant to Federal Rule of Civil Procedure 56 for entry of an order for partial summary judgment against the defendants on all counts of its complaint and intervention.¹ This motion is supported by Defendants' Memorandum filed simultaneously with this Motion.

Pursuant to Local Rule 7.1, I have sought the concurrence of the Defendants Robert Stokes and Robert Stokes P.C. through counsel, and I have been informed that this Motion will be opposed.

¹This motion is described as a request for partial summary judgment because it does not move for summary judgment on all counts of the relator's complaint. Summary judgment is requested on all counts of the United States's complaint in intervention.

Respectfully submitted,

DONALD A. DAVIS
United States Attorney

Dated: November 26, 2008

/s/ J. Joseph Rossi

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